

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEITH LAWNICZAK,

Defendant.

CR No. 17-404(B)-AB

S E C O N D
S U P E R S E D I N G
I N F O R M A T I O N

[18 U.S.C. § 1594(c): Conspiracy
to Engage in Sex Trafficking]


The United States Attorney charges:

[18 U.S.C. § 1594(c)]

Beginning in or around May 2016 and continuing until in or around June 2017, defendant KEITH LAWNICZAK conspired with co-conspirator John Brinson, Jr. to knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, advertise, and maintain by any means, and benefit, financially and by receiving anything of value, from participation in a venture that recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained by any means, Minor Victim 3, knowing and in reckless disregard of the fact that Minor Victim 3 had not attained the age of 18 years, and that Minor Victim 3 would be

1 caused to engage in a commercial sex act, in violation of Title 18,
2 United States Code, Section 1591(a)(1) and (2).

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4 NICOLA T. HANNA
United States Attorney

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7 *Scott M. Garringer*
Deputy Chief, Criminal Division For:

8 BRANDON D. FOX
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10 DEVON MYERS
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13 U.S. Dept. of Justice, Crim. Div.
14 Child Exploitation and Obscenity
Section